

In The Matter Of:
Long, D., v.
Epic Systems Corporation

Videotape 30(b)(6) Deposition of Andrew T. Dolan
February 24, 2016

For The **Record** Inc.
Excellence In Court Reporting

Original File Dolan Andrew 2-24-16.txt
Min-U-Script® with Word Index

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1 A P P E A R A N C E S (Continued)

2 NOAH A. FINKEL, Attorney,

3 for SEYFARTH SHAW LLP, Attorneys at Law,

4 131 South Dearborn Street, Suite 2400, Chicago,

5 Illinois 60603-5577, appearing on behalf of the

6 Defendant.

7 KAIJA HUPITA, Attorney,

8 for EPIC SYSTEMS CORPORATION,

9 1979 Milky Way, Verona, Wisconsin 53593,

10 appearing on behalf of the Defendant.

11 Also present: Connie Hansen, CLVS

12 Video Concepts, Inc.

13 (920) 787-5888

14 MS. HANSEN: Good morning. We are

15 on the record. My name is Connie Hansen,

16 CLVS, representing For the Record. The date

17 is February 24th, 2016. The time is

18 approximately 9:03 a.m. This deposition is

19 being held at Habush, Habush & Rottier

20 located at 150 East Gilman Street, Madison,

21 Wisconsin.

22 The caption of the case is D. Long

23 versus Epic Systems Corporation in the

24 United States District Court for the Western

25 District of Wisconsin. The name of the

witness is Andrew Dolan.

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1 At this time will the attorneys identify

2 themselves and the parties they represent,

3 and then the court reporter, Peggy

4 Christensen, will swear in the witness and we

5 can proceed.

6 MR. KNUTSON: For the plaintiffs,

7 attorneys Jason Knutson, Breanne Snapp, and

8 Katelynn Williams.

9 MR. FINKEL: And for defendant,

10 Noah Finkel and Kaija Hupila.

11 ANDREW T. DOLAN,

12 called as a witness, being first duly sworn,

13 testified on oath as follows:

14 EXAMINATION

15 By Mr. Knutson:

16 Q Good morning. Would you please say your name and

17 then spell your last name.

18 A Andy Dolan, D-o-l-a-n.

19 Q All right. Do you mind if I call you Andy?

20 A That's fine.

21 Q Okay. Thank you. I appreciate it.

22 Andy, have you ever been deposed before?

23 A No.

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1 Q Okay. We're going to talk about it just for ten

2 seconds. I'm sure your lawyer already did a good

3 job of explaining to you what we're doing here

4 today, but I just want to go over a couple ground

5 rules real quickly.

6 Maybe the most important thing is that you

7 answer the questions today out loud. You can't

8 shake your head or say uh-huh or huh-uh, so you

9 actually have to form words that we can all hear

10 and understand. If you don't, it's okay. I'll

11 just ask you to do it, because normal people talk

12 in uh-huhs and huh-uhs all the time, so don't

13 worry about it.

14 I'm going to really try not to interrupt you

15 and let you finish your answers. Okay? If I do

16 interrupt you, just tell me I did, and I'll try to

17 be quiet so you can finish.

18 You get to take a break whenever you want to.

19 This isn't intended to be a marathon. So whenever

20 you need a break, just let us know. If there is a

21 question pending, I'll just have you finish

22 answering it before we do that. Does that all

23 make sense?

24 A Yep.

25 Q Occasionally we're going to hand you some

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1 documents to look at. Take as much time as you

2 want to look at them and make sure you understand

3 them before you start answering questions about

4 them. Good?

5 A Yep. Sounds good.

6 Q All right. I want to start by just finding out

7 who you are quickly. So why don't you tell me

8 real briefly what your educational background is.

9 A I have a BA in English from Lawrence University, a

10 minor in philosophy.

11 Q Lawrence is in Appleton?

12 A Correct.

13 Q Okay. Any degrees beyond that BA?

14 A No.

15 Q Did you go to high school in Appleton?

16 A No.

17 Q Where did you go to high school?

18 A Neenah.

19 Q Okay. Do you live in Madison or Verona now?

20 A Yes.

21 Q That's a good answer to that question. Do you

22 live in Madison?

23 A Yes.

24 Q Okay. Fair enough. Where do you work?

25 A Epic.

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1 Q All right. How long have you worked at Epic?
 2 A 11 years.
 3 Q What is your current job title at Epic?
 4 A We don't really have titles.
 5 Q Okay. Do you have a role at Epic?
 6 A My role -- Yes.
 7 Q Okay. What is your role at Epic?
 8 A Technical communications.
 9 Q All right. Beyond the technical communications
 10 role, are there any other phrases or nomenclature
 11 you use to describe what you do at Epic? For
 12 instance, are you a team lead or a group lead?
 13 A Yes.
 14 Q You're a team lead?
 15 A Yes.
 16 Q Are there any other designations akin to a team
 17 lead that describe what you do at Epic?
 18 A Yes.
 19 Q What are those?
 20 A TL manager.
 21 Q Any others?
 22 A No.
 23 Q Where did you grow up?
 24 A Neenah.
 25 Q When you started at Epic, what was your role?

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1 A Writer.
 2 Q Were you a technical writer or was the role then
 3 just known as writer?
 4 A I don't remember for sure.
 5 Q Have you held any roles at Epic other than writer
 6 and your current role?
 7 A No.
 8 Q Did you work anywhere between obtaining your BA
 9 and the time you started working at Epic?
 10 A No.
 11 Q Do you hold any other degrees or certifications
 12 beyond the BA that we already talked about?
 13 A No.
 14 Q Do you live with anybody in Madison?
 15 A Yes.
 16 Q I don't need their names, but who do you live
 17 with?
 18 A My wife.
 19 Q Okay. Thank you. So you're here today because
 20 we're trying to learn a little bit more about how
 21 the tech comm department in Epic actually works.
 22 Have you been in that department for the past
 23 11 years?
 24 A Yes.
 25 Q Who is your direct report? In other words, who is

Page 11

1 the person that you report to, the person above
 2 you?
 3 A Currently?
 4 Q Yes.
 5 A Dana Apfel.
 6 Q What's Dana's role?
 7 A Technical communications.
 8 Q When did you first find out you were going to be
 9 deposed today?
 10 A I don't remember exactly.
 11 Q Okay. Do you remember generally?
 12 A Approximately one month ago.
 13 Q Since you found out you were going to be deposed,
 14 what, if anything, have you done to prepare for
 15 your deposition?
 16 A What do you mean "prepare"?
 17 Q What I mean by prepare is what actions have you
 18 taken that in your mind help prepare you to be
 19 deposed today, which may include things like
 20 reviewing documents, looking at manuals or things
 21 at work, talking to people other than your lawyer.
 22 A I read some tips on the internet.
 23 Q Okay. Tips on how to give a deposition?
 24 A Yeah.
 25 Q Okay. I don't suppose you remember what website

Page 12

1 it was?
 2 A No.
 3 Q Okay. I hope that was helpful. Did you do
 4 anything else to prepare?
 5 A Outside of counsel? Was that a stipulation?
 6 Q Yeah. I'm going to assume that at some point
 7 you've talked to lawyers about getting ready, and
 8 I don't need to hear about those conversations.
 9 A Okay.
 10 Q I'm talking about anything else that you did to
 11 get ready.
 12 A I reviewed pertinent documents at the request of
 13 counsel.
 14 Q Okay. Do you remember what those documents were?
 15 A Yes.
 16 Q Can you tell me what they were?
 17 A Some of them.
 18 Q Okay. Tell me about the ones you can remember.
 19 A There were some descriptions of the technical
 20 communications role. I believe the government
 21 sort of publishes what technical communications
 22 role is generally like. They have a website.
 23 Some organizational documents about the varying
 24 types of technical communicators at Epic. Those
 25 are the ones that come to mind.

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1 Q Okay. Thanks. Did you bring any of those with
 2 you today?
 3 A I did not.
 4 Q Did you make notes on any of the documents that
 5 you reviewed?
 6 A No.
 7 Q You mentioned some organizational documents that
 8 relate to technical communications at Epic. Are
 9 you able to elaborate on what that document may
 10 have contained or looked like?
 11 A Yes.
 12 Q Okay. Would you, please?
 13 A The one I have in mind talked about -- or showed
 14 the -- some of the team leads, the various areas
 15 that technical communicators work on, the
 16 different types of technical communicators within
 17 those areas, the specialization and expertise kind
 18 of incumbent upon technical communicators in each
 19 of those areas.
 20 Q Okay. I should have asked this question first, so
 21 I apologize. That document wasn't drafted by any
 22 of your lawyers, was it?
 23 A No.
 24 Q Okay. It was some kind of internal Epic document?
 25 A Yes.

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1 Q Okay. Thank you. Do you know if that document
 2 has a name? If you were to try to relocate it,
 3 what it would be called?
 4 A Yes.
 5 Q What would it be called?
 6 A Staffing spreadsheet.
 7 Q Do you know when it was dated or whether it was
 8 current?
 9 A No.
 10 Q Okay. Thanks. Any other documents come to mind
 11 other than the ones you've already described?
 12 A No.
 13 Q I'm going to represent to you that one of your
 14 colleagues, Stirling Martin, was deposed yesterday
 15 in this case. Have you had a chance since
 16 yesterday to talk to him?
 17 A No.
 18 Q You said you found out about your deposition about
 19 a month ago. Had you had any conversations with
 20 him between that time and today about this case?
 21 A Yes.
 22 Q Okay. Do you know generally when that
 23 conversation was?
 24 A Yes.
 25 Q When was it?

Page 15

1 A Last Tuesday. Or last week.
 2 Q All right. Last week, we'll say. Who called that
 3 meeting, you or him or someone else?
 4 A Someone else.
 5 Q Who was that someone else?
 6 A Kaija.
 7 Q Okay. And you've already done a good job with
 8 this, and I don't expect you're going to mess it
 9 up now, but I don't get to hear about any
 10 conversations you had with any of your lawyers.
 11 So let's make sure we don't talk about those.
 12 In the meeting you had with Mr. Martin, was
 13 Kaija or another of your attorneys present?
 14 A Yes.
 15 Q Okay. Was there anybody else at that meeting?
 16 A Yes.
 17 Q Who?
 18 A Cate Valenzuela.
 19 Q And is it your understanding we'll be speaking
 20 with Cate later today?
 21 A Yes.
 22 Q What's Cate's role?
 23 A Technical communications.
 24 Q Does Cate supervise you?
 25 A No.

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1 Q Prior to your deposition, did you review the tech
 2 comm wiki?
 3 A What do you mean review?
 4 Q That's a fair clarification. To prepare for your
 5 deposition today, did you spend any time looking
 6 at the tech comm wiki with the purpose being to
 7 benefit you in some way to give testimony today?
 8 A No.
 9 Q Do you have any idea how large the tech comm wiki
 10 is?
 11 A What -- What do you mean any idea?
 12 MR. FINKEL: And you might want to
 13 clarify whether you're including links or
 14 not.
 15 MR. KNUTSON: Sure.
 16 Q When I use the phrase tech comm wiki, what do you
 17 conceive of? What is that?
 18 A There is a shared Epic wiki. There are portions
 19 of it germane to technical communications. It's
 20 not siloed, per se.
 21 Q Okay. Thank you. The part of the shared wiki
 22 that is relevant to tech comm, I'm trying to
 23 quantify it in some way. It could be by screen
 24 pages, printed pages, bits of electronic data. I
 25 don't really care how you quantify it, but can you

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1 give me any idea of its size, including other
 2 Wikis that it may link to that are germane to tech
 3 comm? And before you answer, I'm not looking for
 4 a lot of precision here.
 5 A Okay.
 6 Q I'm just looking for your best estimate as to how
 7 big this thing is.
 8 A Okay. My best estimate would be hundreds of
 9 printed pages.
 10 Q Okay. If I were to tell you that it's more like
 11 3,000 printed pages, does that sound like it could
 12 be possible to you?
 13 A Yes.
 14 Q Other than preparing for your deposition this
 15 morning, have you taken any other actions related
 16 to this lawsuit? And I'll give you some examples.
 17 Have you saved any documents on your computer
 18 at work? Have you pulled any personnel files?
 19 Have you set up any meetings with other employees
 20 to talk about the case? Those are some examples,
 21 but I'm looking for any other actions you've taken
 22 related to this case since you learned about it.
 23 A No.
 24 Q Were you asked to take any actions and chose not
 25 to?

Page 18

1 A I guess can you define the actions, aside from --
 2 I mean, you gave some examples, but --
 3 Q Yeah. No, I don't have anything specific in mind.
 4 I just want to make sure there wasn't something
 5 that you were asked to do that you just didn't as
 6 opposed to you just not doing anything on your own
 7 initiative.
 8 MR. FINKEL: And I'd caution you
 9 not to reference anything that lawyers may
 10 have asked you to do.
 11 A Then no.
 12 Q Okay. Thanks. Other than the people you already
 13 mentioned, have you talked to anybody in the world
 14 about this case? So I know you met with Stirling.
 15 I know you've met with your lawyers. I think you
 16 may have mentioned talking to Cate.
 17 A What do you mean, "about the case"?
 18 Q So you're aware that the reason we're together
 19 today is because there has been a lawsuit filed
 20 against Epic by a former employee named Dayna
 21 Long; right?
 22 A Yes.
 23 Q Okay. So when I say the case, that's what I'm
 24 referencing. At some point in time you became
 25 aware of that litigation; right?

Page 19

1 A Yes.
 2 Q Okay. And my question is just who have you talked
 3 to about it, other than the people you've already
 4 mentioned?
 5 A I guess the "about" is what I'm questioning. I
 6 think general awareness is different than details.
 7 Q Sure. Let's try some examples, then, see if that
 8 helps. Have you talked to your wife about this
 9 case?
 10 A No.
 11 Q Do you have a best friend who lives in Madison?
 12 A No.
 13 Q Okay. Did you talk to your parents about the
 14 case?
 15 A No.
 16 Q Okay. Do you have any plans to leave Epic? Are
 17 you currently looking for a different job?
 18 A No.
 19 Q Have you been eligible for any of the sabbaticals
 20 during your time at Epic?
 21 A Yes.
 22 Q How many?
 23 A Two.
 24 Q Have you taken either?
 25 A Yes.

Page 20

1 Q Where did you go?
 2 A Italy and France.
 3 Q Thanks. Have you been a part of any meetings at
 4 Epic that involve discussions of whether tech comm
 5 employees should be paid overtime other than with
 6 your lawyers?
 7 A No.
 8 Q What I want to do next is try to understand a bit
 9 about the tech comm department, and maybe I should
 10 start by getting my nomenclature right. Do you
 11 call it a department, an organization, a unit, a
 12 team? What's the word that you use to describe
 13 the group of tech comm employees at Epic?
 14 A A team, although there is not a formal single
 15 designation.
 16 Q I understand. I just want to come up with a word
 17 that you and I can use so we understand each
 18 other. So if I say tech comm team, do you
 19 understand I mean the group or organization of
 20 tech comm-related employees at Epic?
 21 A Yes.
 22 Q Okay. Thanks. If I'm a brand new technical
 23 writer, today is my first day at Epic, who do I
 24 report to? Who tells me what to do?
 25 A Your manager, also called TL.

Page 21

1 Q Sorry. TL?

2 A TL.

3 Q For team lead?

4 A Team lead.

5 Q Okay. So as a new technical writer, I'm

6 designated a team lead?

7 A Yes.

8 Q Okay. All right. Do you have any idea how many

9 team leads there are currently in the tech comm

10 team at Epic?

11 A Yes.

12 Q How many? And, again, I'm not expecting precision

13 from you, just your best estimate.

14 A Around 20.

15 Q Is that roughly the same number of team leads that

16 there were in the tech comm team in 2013?

17 A Yes.

18 Q Let's say my team lead wants to report that Jason,

19 the new technical writer, showed up for work today

20 and has started. Who does my team lead report to?

21 A Their manager. Their team lead.

22 Q Okay. Are there multiple layers of team leads or

23 does the team lead's manager have a different

24 role?

25 A Can you -- What do you mean by -- I mean, there is

Page 22

1 a reporting hierarchy.

2 Q Okay. That's what I'm trying to figure out. So

3 what's the reporting hierarchy for my team lead as

4 a new TL? Who does my team lead report to?

5 A Their team lead.

6 Q Okay. And forgive me my confusion but because

7 we're using the same label as team lead, I just

8 want to make sure we're talking about two

9 different people. Am I correct, the team lead I

10 just reported to has a different team lead to

11 report to?

12 A Yes.

13 Q Okay. I'm going to call that person team lead

14 number 2 just so I don't get completely lost.

15 Team lead number 2 has been told to issue a

16 report of all the new employees that have started

17 today to team lead 2's supervisor. What's that

18 person called?

19 A What do you mean, what are they called?

20 Q What is their role? Is that person another team

21 lead?

22 A They are a team lead. Their role typically would

23 be technical communications.

24 Q Okay. Is there someone who has primary

25 responsibility for the technical communication

Page 23

1 team at Epic?

2 A What do you mean primary responsibility?

3 Q I'll give you an example. So the guy who runs our

4 law firm is named Jim. Jim is what we call our

5 office manager. So he's in charge of everybody in

6 the office. Is there someone like that for the

7 tech comm team?

8 A Yes.

9 Q Who is that person?

10 A Dana Apfel.

11 Q Would you mind just spelling the last name?

12 A A-p-f-e-l.

13 Q Thanks. In the hypothetical that I was clumsily

14 taking you through where I believe we were up to

15 someone -- we were trying to get to who's above

16 team lead 2, is Dana the next person above team

17 lead 2 or is there someone else?

18 A It depends.

19 Q Okay. Who does Dana report to?

20 A Sumit Rana.

21 Q Would you mind spelling that, if you can?

22 A First name Sumit, S-u-m-i-t. Last name Rana,

23 R-a-n-a.

24 Q And that's a Mr.; right?

25 A Correct.

Page 24

1 Q Mr. Rana? Does he have a role?

2 A Yes.

3 Q What is it?

4 A Software developer.

5 Q Who does Mr. Rana report to?

6 A I don't know for sure.

7 Q Is there a terminus for reporting? Is there one

8 last person at the top who receives reports?

9 A Yes.

10 Q Who is that?

11 A Judy Faulkner.

12 Q Thank you. Have we described any of the people

13 who may also be known as director of tech comm?

14 A I don't know.

15 Q Is that not a title that's commonly used in the

16 tech comm team at Epic?

17 A Not commonly.

18 Q Okay. If I were to ask you who your best guess

19 would be as the person who would have that title

20 or role of director of tech comm, would that be

21 Dana or someone else?

22 A Yes.

23 Q Sorry. That's my fault. That was a poorly

24 phrased question. Would it be Dana?

25 A Yes.

Page 25

1 Q Thanks. Going back to the hypothetical where I'm
 2 starting my job as a technical writer at Epic, my
 3 first day would you consider me an entry level
 4 employee?
 5 A No.
 6 Q Is there some requirement for my starting other
 7 than having a college degree of some kind?
 8 A Yes.
 9 Q What are those requirements?
 10 A You must pass the hiring criteria.
 11 Q Are you involved in the hiring process of new
 12 technical writers at Epic?
 13 A Yes.
 14 Q In what way?
 15 A I conduct interviews, and when offers have been
 16 extended assist with placing new hires on the area
 17 they'll be working in.
 18 Q In the course of your participation in hiring new
 19 technical writers at Epic, do you have the
 20 opportunity to review applicants' résumés?
 21 A Yes.
 22 Q Is that something that you do routinely when
 23 participating in new technical writer hiring?
 24 A No.
 25 Q Can you give me your best estimate of how many

Page 26

1 technical writer applicant résumés you've reviewed
 2 in your career at Epic?
 3 A 50.
 4 Q Thank you. Going back to me starting as a
 5 technical writer at Epic, on my first day do I
 6 have any direct reports? Does anybody report to
 7 me?
 8 A Sorry. Can you repeat that?
 9 Q Sure. I want you to assume that I'm starting at
 10 Epic as a technical writer and it's my first day.
 11 Am I managing anyone?
 12 A No.
 13 Q I appreciate you walking us through this. What I
 14 want to do next is try to figure out how the tech
 15 comm team interrelates to some of the other teams
 16 at Epic. And so to do that I need to identify
 17 what some of those other teams are. Okay?
 18 For instance, is there a procurement team at
 19 Epic? Is there a group of people whose job it is
 20 to obtain the materials that Epic needs to do its
 21 work?
 22 A I don't know.
 23 Q Okay. Do you know if there is an accounting team
 24 at Epic?
 25 A Yes.

Page 27

1 Q Okay. What's it called?
 2 A Accounting.
 3 Q Okay. Is there a tax team at Epic?
 4 A I don't know.
 5 Q Is there a marketing team at Epic?
 6 A No.
 7 Q Do you know if Epic's -- Strike that.
 8 Does Epic do any marketing?
 9 A What do you mean by marketing?
 10 Q I'll ask the question I was going to that I
 11 thought was the dumb one to do first.
 12 Do you know if Epic has retained an outside
 13 marketing firm to perform marketing functions?
 14 A I don't know.
 15 Q Do you know if Epic has an employee safety and
 16 health team?
 17 A I don't know.
 18 Q Do you know if Epic has a quality control team,
 19 which may also be known as quality assurance?
 20 A Yes.
 21 Q Is there a director of the quality assurance team?
 22 A Yes.
 23 Q Do you know the name of that person?
 24 A Yes.
 25 Q Okay. Is that person's role technical

Page 28

1 communications?
 2 A Sorry. Say that again.
 3 Q Is the person that you're thinking of someone
 4 whose role is technical communications?
 5 A No.
 6 Q Is there a human resources team at Epic?
 7 A Yes.
 8 Q Do you know who the director of the human
 9 resources team is?
 10 A No.
 11 Q Do you know whether the person has the role of
 12 technical communications?
 13 A No.
 14 Q Do you know how many teams there are at Epic?
 15 A No.
 16 Q Are there any teams at Epic other than technical
 17 communications that are directed by someone with
 18 the role technical communications?
 19 A What do you mean by team?
 20 Q So I was giving some examples: human resources,
 21 accounting, marketing, technical communications.
 22 I don't know the names of all the teams at Epic.
 23 Are there any teams you're aware of where the
 24 director of the team has the role technical
 25 communications other than, of course, the

<p style="text-align: right;">Page 29</p> <p>1 technical communications team?</p> <p>2 A Not in the sense that you're using team currently.</p> <p>3 No.</p> <p>4 Q Okay. Sorry to be a lawyer, but there must be</p> <p>5 another way to use team that you're conceiving of</p> <p>6 where maybe the answer to my question would be</p> <p>7 different. Is there?</p> <p>8 A Yes.</p> <p>9 Q Okay. Can you describe for me the use of the word</p> <p>10 team that you're thinking of?</p> <p>11 A Team can mean -- I mean, it's an open-ended term.</p> <p>12 It could mean application team in the sense that</p> <p>13 you've used it, the role. It could be a customer</p> <p>14 team. So a group of coworkers you work with on --</p> <p>15 Q Okay. I think I understand you.</p> <p>16 A -- is a customer.</p> <p>17 Q All right. I appreciate you explaining that. So</p> <p>18 I'm using team in the way that perhaps a nonEpic</p> <p>19 person does. I'm thinking more like a department.</p> <p>20 So, for instance, using my law firm again, we</p> <p>21 have an accounting department, we have an HR</p> <p>22 department, we have a facilities department, and</p> <p>23 my question was whether you're aware of anybody</p> <p>24 who directs or manages any of those departments at</p> <p>25 Epic that has the role technical communications.</p>	<p style="text-align: right;">Page 31</p> <p>1 A Yes.</p> <p>2 Q And hopefully there is a number 4 in it. Is</p> <p>3 there?</p> <p>4 A Yes.</p> <p>5 Q Good. So I may refer to that as Exhibit No. 4,</p> <p>6 and then you'll know what I'm talking about.</p> <p>7 Okay?</p> <p>8 I just need your help in understanding what</p> <p>9 this document represents. Have you seen this</p> <p>10 before?</p> <p>11 A Yes.</p> <p>12 Q Okay. Let me ask a better question. Have you</p> <p>13 seen this particular document before or have you</p> <p>14 seen one that looks like it?</p> <p>15 A What do you mean, "this particular document"?</p> <p>16 Q That's a fair question. Did you say you had a</p> <p>17 philosophy minor?</p> <p>18 A Yes.</p> <p>19 Q Okay. Was it in any particular area of</p> <p>20 philosophy?</p> <p>21 A No.</p> <p>22 Q Okay. Epistemology? I'm just teasing you,</p> <p>23 because my undergrad is in philosophy too.</p> <p>24 What I mean is not this exact document,</p> <p>25 meaning the one that exists in space and time</p>
<p style="text-align: right;">Page 30</p> <p>1 Does that help? Does that make more sense?</p> <p>2 A Yes.</p> <p>3 Q Okay.</p> <p>4 A Sorry. Could you ask that one more time?</p> <p>5 Q Sure. No problem. Does anyone with the role</p> <p>6 technical communications direct or manage any</p> <p>7 department at Epic other than the technical</p> <p>8 communications team?</p> <p>9 A No.</p> <p>10 Q Thanks. This would be an okay time to take a</p> <p>11 break if you need one already. Otherwise, we're</p> <p>12 going to start looking at some documents. It's up</p> <p>13 to you.</p> <p>14 A I wouldn't mind some water, actually.</p> <p>15 Q All right. Why don't we just take a short break.</p> <p>16 A Sure.</p> <p>17 MS. HANSEN: Going off the record.</p> <p>18 The time is 9:40.</p> <p>19 (Recess)</p> <p>20 MS. HANSEN: We are back on the</p> <p>21 record at 9:48.</p> <p>22 Q Welcome back. We're going to start this process</p> <p>23 of looking at documents. Okay? So I'm handing</p> <p>24 you a paper clipped series of papers, and you'll</p> <p>25 see a yellow sticker on it. Do you see that?</p>	<p style="text-align: right;">Page 32</p> <p>1 before you right now, but a copy of it that</p> <p>2 existed at some other point?</p> <p>3 A I don't know.</p> <p>4 Q Okay. That's fine. Can you tell me generally</p> <p>5 what your understanding of this document's purpose</p> <p>6 is?</p> <p>7 A Yes.</p> <p>8 Q What is that?</p> <p>9 A It indicates the area that individual technical</p> <p>10 writers work on and who their manager/team lead</p> <p>11 is.</p> <p>12 Q Okay. Thank you. By looking at this document,</p> <p>13 are you able to tell me for what time period it is</p> <p>14 relevant?</p> <p>15 A Yes.</p> <p>16 Q And what is your best estimate for that time</p> <p>17 period?</p> <p>18 A My best estimate is this was the team as of early</p> <p>19 2014.</p> <p>20 Q Thank you. Let's pick the third box on the left</p> <p>21 that appears to have the heading Support Writing -</p> <p>22 Access & Tech Apps and Revenue/Cogito. Close-ish?</p> <p>23 C-o-g-i-t-o, Cogito. The first name under that is</p> <p>24 Matt Becker. Do you see where I am?</p> <p>25 A Yes.</p>

<p style="text-align: right;">Page 33</p> <p>1 Q Okay. Does this representation then indicate that 2 Matt Becker is the team lead for that area? 3 A Yes. 4 Q And if you look further down in that box, there 5 are a group of three names, Jessica, Leah, and 6 Dakota. Do you see those three? 7 A Yes. 8 Q Is it true that Jessica, Leah, and Dakota would 9 report to Cate, and Cate would then report to 10 Matt? 11 A Yes. 12 Q All right. It looks like you appear on the second 13 page of this document where there is just one box. 14 Do you see that? 15 A Yes. 16 Q Okay. And this box is entitled Content 17 Management & Publication with your name at the 18 top. Your name then appears again. Do you see 19 that? 20 A Yes. 21 Q Can you just explain to me why that is? 22 A What aspect would you like explained? 23 Q I'll try it this way: Does your name appear in 24 that box twice because you were filling multiple 25 roles within the content management and</p>	<p style="text-align: right;">Page 35</p> <p>1 Q Okay. Have you seen a spreadsheet like this 2 before? 3 A Yes. 4 Q What is its purpose at Epic? 5 A Can you be more specific? 6 Q Sure. Does this document have a use within Epic? 7 A Yes. 8 Q How would you describe its use? 9 A It is used to track those who have left the team. 10 List, enumerate those who have left the team. 11 Q Thank you. Have you ever populated a table like 12 this in the course of your work at Epic? 13 A Have I populated? What do you mean populated? 14 Q Have you ever had to fill out any of the fields in 15 a table like this? 16 A Yes. 17 Q Do you have an understanding of what types of 18 comments are intended to be captured in the 19 Comments column? 20 A I don't know. 21 Q That is fine. If you would go to the fourth page 22 of the document. In the version I'm looking at it 23 starts with Sarah at the top and ends can Katie at 24 the bottom. Have you found it? 25 A Yes.</p>
<p style="text-align: right;">Page 34</p> <p>1 publication group? 2 A What do you mean by role? 3 Q Let's just move on. What does the turnover spot 4 label refer to? And I'm still on the content 5 management and publication box. 6 A That indicates previously someone worked in that 7 area. 8 Q Like any job in the world, there is occasionally 9 turnover in the tech comm team? Employees leave? 10 This isn't a trick question, because the 11 alternative is pretty scary. 12 A I didn't hear a question. 13 Q Okay. I'll emphasize the question part of it. Do 14 tech comm employees occasionally leave the tech 15 comm team for one reason or another? 16 A Yes. 17 Q Okay. If you turn to page 3 of this document, 18 there appears to be a table with, I don't know, 19 roughly 100 rows in, and the far left column is 20 called Departed with names underneath it. Do you 21 see that? 22 A Yes. 23 Q The far right column appears to be labeled 24 Comments. Do you see that one? 25 A Yes.</p>	<p style="text-align: right;">Page 36</p> <p>1 Q Okay. In the columns column, roughly 15 lines 2 down, there are a series of one, two, three, four, 3 five, six, seven -- seven entries, one upon 4 another. Do you see that? The first one starts 5 Jay Craig. 6 A Sorry. Can you orient me again? 7 Q Sure. Sure. 8 MR. FINKEL: Look over here. 9 MR. KNUTSON: Thanks, Noah. 10 A Oh, right, right, right. Yeah. 11 Q Do you see where I am? 12 A Yes. 13 Q Okay. It looks like four times in that cluster of 14 comments the phrase low performer is used. Are 15 you able to locate any of those? 16 A Yes. 17 Q Okay. What's your understanding of what's meant 18 by low performer as it's used there? 19 A It would seem to indicate they are not meeting the 20 expectation of the role. 21 Q If there -- 22 A Their job performance, in other words. 23 Q If you follow those low performer rows all the way 24 to the left, they correspond with people's names. 25 Do you personally know any of those people who</p>

<p style="text-align: right;">Page 37</p> <p>1 were described as low performers?</p> <p>2 A No.</p> <p>3 Q Would you mind turning, please, to the seventh</p> <p>4 page of the document.</p> <p>5 MR. FINKEL: That one.</p> <p>6 Q Why don't you just take a moment to look at it.</p> <p>7 Have you seen a page like this one before?</p> <p>8 A Yes.</p> <p>9 Q It appears at the top of the page that it contains</p> <p>10 information up to the year 2011. Do you know if a</p> <p>11 similar table exists for the years 2012 until the</p> <p>12 present?</p> <p>13 A I don't know.</p> <p>14 Q If you needed to get that table, who would you ask</p> <p>15 to try to locate it?</p> <p>16 A I don't know.</p> <p>17 Q Have you done any independent research or</p> <p>18 investigation to try and determine how many</p> <p>19 technical writers worked at Epic between 2012 and</p> <p>20 2014?</p> <p>21 A No.</p> <p>22 Q You can set that document aside. Thanks. If I</p> <p>23 use the phrase software development cycle, what</p> <p>24 does that mean to you in the context of Epic</p> <p>25 Systems?</p>	<p style="text-align: right;">Page 39</p> <p>1 creating the design based on those requirements.</p> <p>2 Q And we're talking about software requirements;</p> <p>3 right?</p> <p>4 A Yes.</p> <p>5 Q Okay. Is there a team at Epic primarily</p> <p>6 responsible for the design portion of the software</p> <p>7 development cycle that you just described?</p> <p>8 A Yes.</p> <p>9 Q I could guess, but I won't. Which team do you</p> <p>10 have in mind?</p> <p>11 A Software development.</p> <p>12 Q Thanks. What happens next in the software</p> <p>13 development cycle?</p> <p>14 A Once a design is approved, the software developer</p> <p>15 for that project begins work writing the code.</p> <p>16 Q Are software developers sometimes just called</p> <p>17 developers at Epic?</p> <p>18 A Yes.</p> <p>19 Q And is there a software development team at Epic?</p> <p>20 A Yes.</p> <p>21 Q What happens next in the software development</p> <p>22 cycle?</p> <p>23 A Upon completion of the initial development,</p> <p>24 another developer would review that project,</p> <p>25 review the code.</p>
<p style="text-align: right;">Page 38</p> <p>1 A A very broad terminology to describe the process</p> <p>2 of investigating, designing, developing, and</p> <p>3 releasing the software.</p> <p>4 Q The tech comm team plays a part in the software</p> <p>5 development cycle at Epic; right?</p> <p>6 A Yes.</p> <p>7 Q Do you feel competent to testify about the</p> <p>8 structure of the software development cycle</p> <p>9 generally?</p> <p>10 A How generally?</p> <p>11 Q My ultimate goal here is to try to understand at</p> <p>12 which point or points in the software development</p> <p>13 cycle the tech comm team is implicated. That</p> <p>14 would be hard for you to do if you don't know the</p> <p>15 whole software development cycle. So if you</p> <p>16 don't, I just need to know that. But if you do</p> <p>17 feel like, You know, I do have a handle on the</p> <p>18 software development cycle, then we can talk about</p> <p>19 it.</p> <p>20 A Yes.</p> <p>21 Q Okay. Can you tell me what the first steps are in</p> <p>22 the software development cycle, please?</p> <p>23 A Well, as the name cycle would indicate, it is not</p> <p>24 merely linear; however, generally it would begin</p> <p>25 with obtaining requirements, creating -- and then</p>	<p style="text-align: right;">Page 40</p> <p>1 Q What is your understanding of the purpose of that</p> <p>2 step in the cycle?</p> <p>3 A To help ensure code quality, find bugs in the</p> <p>4 code.</p> <p>5 Q Anything else?</p> <p>6 A No.</p> <p>7 Q Okay. What happens next?</p> <p>8 A There may be several iterations of that review.</p> <p>9 Once it has reached a sign-off of involved</p> <p>10 parties, it would be moved on to the next phase.</p> <p>11 Q Which is what?</p> <p>12 A Stage two.</p> <p>13 Q What happens in stage two?</p> <p>14 A Many -- It's not just one sort of thing happens.</p> <p>15 Generally at that point the project is considered</p> <p>16 stable, or somewhat stable. At that point often</p> <p>17 the documentation will begin or records --</p> <p>18 technical communicators would begin working on</p> <p>19 documentation. It may be tested by quality</p> <p>20 assurance folks. In some cases additional code</p> <p>21 review may take place.</p> <p>22 Q Thanks. What happens next?</p> <p>23 A It depends.</p> <p>24 Q Okay. Thanks. Where are the technical writers at</p> <p>25 Epic physically located?</p>

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1 A In their offices.
 2 Q Are their offices located in Verona?
 3 A Yes.
 4 Q Are there any technical writers who still reside
 5 in the Madison office?
 6 A I don't know.
 7 Q How would you find out?
 8 A I would look on Guru.
 9 Q Say again.
 10 A We have an internal system that I could look that
 11 up.
 12 Q Where in the internal system would you go to look
 13 it up?
 14 A There is a web page. It has everyone's office
 15 listed.
 16 Q All right. Does that web page identify the team
 17 the person is on as well?
 18 A Yes.
 19 Q Okay. So you would go on the web page, you would
 20 look for a tech comm team, and then look at the
 21 corresponding office?
 22 A Role.
 23 Q Role.
 24 A Yes.
 25 Q All right. There are multiple buildings on the

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1 Epic Verona campus; true?
 2 A Yes.
 3 Q Okay. Are the technical writers who are located
 4 on the Verona campus located in multiple buildings
 5 or just one?
 6 A Multiple buildings.
 7 Q Is there one building in particular that houses
 8 the majority of the technical writers?
 9 A No.
 10 Q Are there any technical writers who spend the
 11 majority of their time at a customer's location,
 12 at a hospital or clinic facility?
 13 A No.
 14 Q Does the tech comm team at Epic have any writing
 15 standards, procedures, or processes in place that
 16 relate to how it produces its deliverables?
 17 A Yes.
 18 Q I want to ask you about some of those. Okay?
 19 Do you have writing standards that emphasize
 20 uniformity, boilerplate, and minimalism?
 21 A I don't know.
 22 Q Okay.
 23 MS. SNAPP: It's Exhibit 5.
 24 MR. KNUTSON: Thanks. 5, Noah.
 25 MR. FINKEL: Okay.

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1 Q I handed you a document marked Exhibit 5. Have
 2 you seen a document similar to that one before?
 3 A Yes.
 4 Q Why don't you take just a minute to review it so
 5 you can make sure you're familiar with it. Have
 6 you had a chance to look it over?
 7 A Yes.
 8 Q Do you know what the purpose of this document is
 9 within Epic?
 10 A Yes.
 11 Q What is that?
 12 A During the hiring process, during the -- we will
 13 have candidates speak with a member of the tech
 14 comm team to give a broad spectrum overview of
 15 what the job is like, get an opportunity to ask
 16 questions, things of that nature.
 17 Q Okay. Thank you. Would you turn to the second
 18 page of the document, please. Do you see a
 19 heading that says Nature of the writing we do?
 20 A Yes.
 21 Q All right. And I'm just going to look at the
 22 second and third bullet points here. The second
 23 bullet point says, Role of reviewers; editing
 24 process. Below that it says style guides,
 25 boilerplate, and minimalism. Do you see that?

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1 A Yes.
 2 Q Is it your understanding that that's intended to
 3 give candidates an idea of the nature of the
 4 writing that the technical writers do at Epic?
 5 A No.
 6 Q What is it intended to convey?
 7 A It's difficult to comprehensively cover -- or I
 8 don't want to make assumptions of how they say
 9 very limited terminology. It's to give the
 10 overview discussion points that may be relevant
 11 to something the candidate is asking. It's not
 12 intended to be a comprehensive sort of indication
 13 of all the work, which I gathered is what you were
 14 asking.
 15 Q Okay. The description itself is minimalist, isn't
 16 it?
 17 A Yes.
 18 Q Does a Style Guide exist at Epic for use by the
 19 technical writers?
 20 A Yes.
 21 Q Is there also a document called Writing at Epic
 22 Companion?
 23 A I don't know.
 24 MR. KNUTSON: Has this been marked?
 25 MR. FINKEL: We did yesterday.

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1 MR. KNUTSON: I think we may have
 2 just done the Style Guide yesterday.
 3 MR. FINKEL: It was marked 13.
 4 MR. KNUTSON: 13.
 5 Q All right. You've been handed a packet of papers
 6 with a sticker on it marking it as Exhibit No. 13.
 7 Do you see that?
 8 A Yes.
 9 Q Okay. Does this help refresh your memory as to
 10 whether there is a document at Epic called the
 11 Writing at Epic Companion? Let me ask a different
 12 question.
 13 Have you seen this before?
 14 A No.
 15 Q Okay. I'm not going to ask you any more questions
 16 about it. You indicated there is a Style Guide at
 17 Epic; right?
 18 A Yes.
 19 Q Okay. Is the Style Guide intended to provide
 20 rules and recommendations that the writers use
 21 when writing technical documents at Epic?
 22 A Yes.
 23 Q Based on one of the documents we looked at
 24 earlier, am I right that you supervise some number
 25 of technical writers?

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1 A Yes.
 2 Q Have you ever told any of the technical writers
 3 you supervise that they do not have to follow the
 4 Style Guide at Epic?
 5 A I don't remember.
 6 Q Have any of the technical writers you've
 7 supervised ever told you that they just weren't
 8 going to follow the Style Guide at Epic?
 9 A I don't remember.
 10 Q Okay. When I use the phrase deliverable, does
 11 that word have any particular meaning for you in
 12 your role at Epic?
 13 A Yes.
 14 Q And what is it? What is a deliverable to you?
 15 A A deliverable generally refers to a specific type
 16 of document intended for an audience at a customer
 17 to meet a business need.
 18 Q Does every deliverable that the tech comm team
 19 produces have its own wiki in the Epic system?
 20 A I don't know.
 21 Q Can you think of any deliverable that does not
 22 have a wiki in the Epic system?
 23 A Yes.
 24 Q What came to mind?
 25 A Actually, I may need to revise that. I think

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1 there is a wiki for the one -- for the example I
 2 had thought of. So --
 3 Q Okay. Do you need more time?
 4 A Yeah.
 5 Q Okay.
 6 A No examples are coming to mind. However, this is
 7 based purely on memory, so --
 8 Q Okay. That's fine. Thanks for trying.
 9 Are there templates that exist that technical
 10 writers at Epic use to produce deliverables?
 11 A What do you mean by templates?
 12 Q Are there guidelines that are in some computer
 13 form that guide how technical writers produce
 14 deliverables?
 15 A What do you mean by guide, how they produce --
 16 Q Maybe it will be easier if I just show you an
 17 example of what I'm thinking of.
 18 (Exhibit No. 22 marked for
 19 identification)
 20 Q Okay. You have a new exhibit in front of you
 21 marked 22. Do you see that?
 22 A Yes.
 23 Q Okay. Have you seen a document like this one
 24 before?
 25 A Yes.

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1 Q Okay. What is it? What is this?
 2 A This is a printout of a wiki article from Epic's
 3 internal wiki.
 4 Q Are you able to discern what the purpose of this
 5 wiki is?
 6 A Yes.
 7 Q What is that?
 8 A It's to give high-level guidance to describe the
 9 business need being met with this deliverable,
 10 give guidance for authors of that type of document
 11 so they would understand the high-level focus of
 12 that deliverable.
 13 Q In looking through the document, are there any
 14 sections in it that are described as being
 15 required in the production of a deliverable of
 16 this type? And spoiler alert, there are.
 17 A Yes.
 18 Q Yes. I'm looking at page number 2. Do you see
 19 that?
 20 A Yes.
 21 Q Okay. It looks like the first one on that page is
 22 titled Implementation Impact. Do you see that?
 23 A Yes.
 24 Q Okay. I'll just read it out loud. It says,
 25 "Include details about how long the project should

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1 take to implement and who should be involved. If
 2 the project uses common tools, such as
 3 BestPractice Advisories, Health Maintenance, the
 4 Rule Editor, or SmartForms, assume that the
 5 organization already has the tools installed. You
 6 can follow the general implementation impact
 7 guidelines on the release notes wiki." Did I read
 8 that correctly?
 9 A Yes.
 10 Q The reason why we're doing this is because I had
 11 asked a question about whether there are any
 12 templates in place to guide how the technical
 13 writers produce a deliverable. This is an example
 14 of the type of thing I had in mind. It sounds
 15 like we just weren't communicating, though. You
 16 weren't understanding what I was talking about.
 17 So would you describe this Implementation
 18 Impact (required) section as something else other
 19 than a template?
 20 A Yes.
 21 Q Okay. What would you call it?
 22 A I would call it a guideline.
 23 Q Period? Okay. Thanks.
 24 Are there any computer systems within Epic
 25 which a technical writer would use to produce a

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1 deliverable that have fillable fields? You may be
 2 familiar with the Access Microsoft product. I'm
 3 thinking of something similar to that?
 4 A Similar to Access?
 5 Q In that there is a box where the writer fills in
 6 information.
 7 A When you say box, can you talk about box more?
 8 Q Sure. I'll try.
 9 A field. Is there a prescribed document
 10 template with open fields that technical writers
 11 fill?
 12 A Can you give me an example of the template that
 13 you're -- I mean, you've called this a template.
 14 Q Yeah. I'll bet we'll get to one at some point, so
 15 let's just put that question on hold for now.
 16 Okay?
 17 A Okay.
 18 Q Okay. Do any of the -- I think you called it a
 19 guideline. Do any of the guidelines that the
 20 technical writers get include a What to Write
 21 section?
 22 A I don't know.
 23 (Exhibit No. 23 marked for
 24 identification)
 25 Q You've just been handed number 23. Take a second

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1 to look at it, please.
 2 Okay. Is this also from Epic's wiki?
 3 A Yes.
 4 Q It appears this document is entitled Batch
 5 Scheduler Templates. Do you see that at the top
 6 of the first page?
 7 A Yes.
 8 Q Okay. So this one I'm going to call a template
 9 because it is so titled. Do you see in the
 10 contents box there is a numeral 3, it says What to
 11 Write?
 12 A Yes.
 13 Q And if you turn to page 3, there is a heading with
 14 a pen next to it that says What to Write. Do you
 15 see that?
 16 A Yes.
 17 Q Okay. Is the What to Write section intended to
 18 guide the technical writers in what to write for a
 19 batch scheduler template?
 20 A Yes.
 21 Q Is there a wiki at Epic that describes each piece
 22 of the Setup & Support Guide Content Model?
 23 A I don't know.
 24 (Exhibit No. 24 marked for
 25 identification)

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1 Q I'll spare you having to read this whole one.
 2 What we need is in the first paragraph on the
 3 first page. This has been marked Exhibit 24. Is
 4 this also from Epic's wiki?
 5 A Yes.
 6 Q It's titled S&S Content Model. Would you agree
 7 that S&S in this context stands for setup and
 8 support?
 9 A Yes.
 10 Q And the first sentence says, "This wiki describes
 11 each piece of the Setup & Support Guide content
 12 model." Do you see that?
 13 A Yes.
 14 Q Does that -- Well, now that you've seen this, do
 15 you believe you've seen this wiki before?
 16 A Yes. Probably.
 17 Q Thanks. We're done with that. Do you know if
 18 there is a page in Epic's wiki that collects the
 19 Wikis that describe how to write about various
 20 products and features?
 21 A Say that again.
 22 Q A page that collects the Wikis that describe how
 23 to write about various products and features?
 24 A I don't know.
 25 Q I'll bet you know what's coming.

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1 (Exhibit No. 25 marked for
 2 identification)
 3 Q You've been handed 25. Does this appear to be a
 4 page from Epic's wiki?
 5 A Yes.
 6 Q It's entitled Products and Features. Do you see
 7 that?
 8 A Yes.
 9 Q The first sentence says, "This page collects the
 10 wikis that describe how to write about various
 11 products and features." Do you see that?
 12 A Yes.
 13 Q Are all the bullet-pointed items then below what
 14 are referred to as products and features?
 15 A Yes.
 16 Q Thank you. Are you familiar with an Epic wiki
 17 that describes itself as a portal that collects
 18 wikis that describe various processes we have on
 19 the tech comm team?
 20 A Sorry. Say that one more time.
 21 Q That's okay. I'm talking about one that describes
 22 itself as collects wikis that describe various
 23 processes we have on the tech comm team. It's
 24 entitled Processes and Tips.
 25 A I'm not familiar from memory.

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1 (Exhibit No. 26 marked for
 2 identification)
 3 Q Does that one say 26 on it?
 4 A Yes.
 5 Q Does it look like it comes from Epic's wiki?
 6 A Yes.
 7 Q It's entitled Processes and Tips, and I'm just
 8 going to read the first couple sentences. It
 9 says, "This portal collects wikis that describe
 10 various processes we have on the Tech Comm team.
 11 In general, these processes are not specific to a
 12 particular deliverable (the deliverable-specific
 13 wikis have more information on those kinds of
 14 processes)." Did I read that correctly?
 15 A Yes.
 16 Q You're familiar with the Cumulus Content Model?
 17 Let me describe it a different way. Does the
 18 word Cumulus mean something to you in terms of
 19 technical writing at Epic?
 20 A Yes.
 21 Q Is Cumulus actually short for something else?
 22 A No.
 23 Q Is the Cumulus Content Model an enforceable
 24 outline that defines the structure for documents
 25 technical writers produce and makes them follow

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1 the rules?
 2 A The question isn't accurate --
 3 Q Okay.
 4 A -- to my knowledge. I can't answer the question
 5 as posed. There is --
 6 Q That's fine.
 7 A Cumulus Content Model is not a meaningful phrase.
 8 Q All right. I understand.
 9 MS. SNAPP: It's Exhibit 11.
 10 MR. KNUTSON: Thanks. This is
 11 Exhibit 11 from yesterday, Noah.
 12 MR. FINKEL: Thanks.
 13 Q You've been handed what's been previously marked
 14 as Exhibit 11. Toward the bottom there is a
 15 subheading that says Content Model and Infotype.
 16 Do you see that?
 17 A Yes.
 18 Q Okay. I'm looking at the paragraph that reads, "A
 19 content model is an enforceable outline that
 20 defines the structure for your document and makes
 21 you follow the rules. There's a content model for
 22 each type of document we produce from Cumulus.
 23 You might learn a content model from a wiki,
 24 informally from another writer, or in a dedicated
 25 class." Do you see where I read that?

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1 A Yes.
 2 Q Was part of the confusion with my question the
 3 difference between a content model and Cumulus
 4 generally?
 5 A Yes.
 6 Q Okay. Would you agree with this paragraph that
 7 describes what a content model is in the tech comm
 8 team at Epic?
 9 A No.
 10 Q Let's go back to the hypothetical where I'm
 11 starting as a technical writer at Epic again.
 12 When do I receive my Style Guide? When do I
 13 receive the Style Guide document, either in paper
 14 form or electronically?
 15 A I don't know.
 16 Q Okay. Is it your best guess that I would get it
 17 during training at some point?
 18 A Yes.
 19 Q If I'm tasked with production of my first
 20 deliverable as a new technical writer, do I have
 21 the freedom to deviate from the Style Guide
 22 without approval from someone else?
 23 A Yes.
 24 Q Can you give me an example of how?
 25 A So when you're creating a document, you are

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1 essentially given a need that you need to meet,
 2 but there is no sort of programatic enforcement of
 3 the particular words you need to write or anything
 4 like that. It is a -- Really, one must gather
 5 information, synthesize it, and best meet the
 6 needs of the audience, our customers. That's the
 7 number one goal.
 8 Q Maybe it would help if I gave you an example. In
 9 our conversation yesterday, we discovered in the
 10 Style Guide that there are certain terms or
 11 phrases to avoid, and one that we learned about
 12 was debugging. And I'll represent to you the
 13 document indicated that you should avoid use of
 14 the term debugging and instead use some different
 15 words.
 16 As a technical writer at Epic, is it your
 17 understanding that I'm allowed to deviate from a
 18 requirement like that in the Style Guide without
 19 approval from someone else?
 20 MR. FINKEL: Object to the form of
 21 the question about requirement. You can go
 22 ahead and answer.
 23 A Yes.
 24 Q Have you ever instructed one of the technical
 25 writers working in one of your groups at Epic that

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1 they are free to ignore the requirements of the
 2 Style Guide?
 3 A I don't remember.
 4 Q Okay.
 5 MR. KNUTSON: This would be a
 6 logical stopping point if you need a break,
 7 or we can keep going.
 8 THE WITNESS: We can take a break.
 9 MR. KNUTSON: Okay.
 10 THE WITNESS: Yeah.
 11 MS. HANSEN: Going off the record,
 12 end of DVD number 1. The time is 10:42.
 13 (Recess)
 14 MS. HANSEN: We are back on the
 15 record with DVD number 2. The time is 10:58.
 16 Q Thank you. As part of your job, do you ever
 17 review the TLPs for technical writers?
 18 A No.
 19 Q Do you track your time at Epic?
 20 A Yes.
 21 Q What is the name of the system you use to do that?
 22 A DeLorean.
 23 Q DeLorean? How often do you input the time you've
 24 worked into the DeLorean system?
 25 A Approximately once a week.

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1 Q Is there a requirement for you to have your time
 2 in by any particular time? In other words, end of
 3 the day, end of the week, end of the month, end of
 4 the quarter?
 5 A Yes.
 6 Q And what is that deadline for you to have your
 7 time in?
 8 A End of the month.
 9 Q As a team lead, do you still spend the majority of
 10 your time producing deliverables or doing
 11 something else? And I'm not talking about team
 12 leads generically. I'm just talking about you
 13 specifically.
 14 A Can you rephrase -- repeat the question?
 15 Q Sure. I'll try.
 16 As a team lead, do you spend the majority of
 17 your time producing deliverables or doing
 18 something else?
 19 A Yes.
 20 Q You spend the majority of your time producing
 21 deliverables?
 22 A No.
 23 Q You spend the majority of your time doing
 24 something else?
 25 A Yes.

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1 Q What is the something else that you do with the
 2 majority of your time?
 3 A It varies.
 4 Q Can you give me some examples, please?
 5 A I do project management, design our content
 6 delivery software, internal support, working with
 7 team members.
 8 Q Do any of the technical writers who work under you
 9 spend the majority of their time doing something
 10 other than producing deliverables?
 11 A What do you mean, producing deliverables?
 12 Q Let's use your definition, which is probably going
 13 to be better than mine. When I use that phrase,
 14 producing deliverables, what does that mean to
 15 you?
 16 A In general terms, it means identifying a topic or
 17 subject matter, researching, investigating what
 18 information to put into a document or using that
 19 as a survey for deliverable, writing that content,
 20 collaborating with others, and producing the
 21 finished document.
 22 Q Is editing also part of the process you just
 23 described?
 24 A Yes.
 25 Q Are there any technical writers who work for you

<p style="text-align: right;">Page 61</p> <p>1 who spend the majority of their time doing 2 something other than what you just described? 3 A Yes. 4 Q Who? 5 A Casey. 6 Q Casey. What is Casey -- 7 A Casey Bushmaker. 8 Q Okay. What does Casey do with the majority of 9 Casey's time? 10 A It various. 11 Q Can you please give some examples? 12 A He does internal support, writes internal code for 13 our content management system, does a lot of 14 Access LT, fixes bugs, reporting. 15 Q What is Casey's role? 16 A Technical communications. 17 Q It sounds like Casey might have some technical 18 background in computing. Is that right? 19 A What do you mean by background? 20 Q I think you described doing something with the 21 programmer or coding for Casey. Did I hear you 22 correctly? 23 A Yes. 24 Q Okay. What languages is Casey using when Casey 25 does those things?</p>	<p style="text-align: right;">Page 63</p> <p>1 A Yes. 2 Q When you do that, are there any codes associated 3 with the work that you've done? 4 A Yes. 5 Q Are you aware of any technical writer who spends 6 the majority of their time doing work associated 7 with a cafeteria billing code? 8 A No. 9 Q When I use the phrase foundation code or 10 foundation source or source code, do those phrases 11 mean anything to you? 12 A Yes. 13 Q What do they mean to you? 14 A Well, the first two don't. Source code has a 15 broad definition. 16 Q What about the other? 17 A Say it again. 18 Q Foundation code? 19 A There is a team at Epic called foundations. 20 Q Do you know what they do? 21 A Yes. 22 Q What is that? 23 A They work on infrastructure of the software shared 24 amongst the other applications. 25 Q Are you aware of any technical writers at Epic who</p>
<p style="text-align: right;">Page 62</p> <p>1 A Caché ObjectScript, Access LT, SQL. 2 Q Anything else? 3 A Visual Basic 6. 4 Q Are knowledge of the computer languages you just 5 described a prerequisite for someone being hired 6 as a technical writer at Epic? 7 A No. 8 Q Are you aware of any technical writer at Epic who 9 spends the majority of his or her time working in 10 the cafeteria at Epic? 11 A No. 12 Q Do you know any technical writer who works in the 13 cafeteria at all? 14 A What do you mean, works in the cafeteria? 15 Q Am I right that when an Epic employee performs 16 some work task there is a corresponding billing 17 code that goes with that task? 18 A A building code? 19 Q Billing. 20 A Billing code. 21 Q Let me withdraw the question. You talked about 22 entering your time approximately every week; 23 right? 24 A Yes. 25 Q Into the DeLorean system?</p>	<p style="text-align: right;">Page 64</p> <p>1 spend the majority of their time working on the 2 foundation code? 3 A No. 4 Q Are you aware of any members of the technical 5 writing team that spend the majority of their time 6 making sales calls? 7 A No. 8 Q How about technical writers who spend the majority 9 of their time negotiating with Epic's customers 10 over the price of the software? 11 A No. 12 Q Are there any technical writers who spend the 13 majority of their time arranging travel plans for 14 Epic employees? 15 A No. 16 Q Is there another team that handles that? 17 A Yes. 18 Q Do you know the name of that team? 19 A Yes. 20 Q What is it? 21 A Travel. 22 Q Any technical writers who spend the majority of 23 their time engineering Epic software? 24 A What do you mean by engineering? 25 Q Have you ever heard the phrase software engineer</p>

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1 used at Epic?
 2 A Yes.
 3 Q And when you heard it, what was the context for
 4 it?
 5 A Typically in the context of technical services or
 6 software developers.
 7 Q Is technical services sometimes called TS?
 8 A Yes.
 9 Q Is that a team at Epic?
 10 A Yes.
 11 Q Is that team distinct from the technical
 12 communications team?
 13 A Yes.
 14 Q Are there any Epic employees with the role
 15 technical communications who spend the majority of
 16 their time working in the technical service team?
 17 A No.
 18 Q Are there any technical writers who spend the
 19 majority of their time purchasing the furniture in
 20 the technical service team area?
 21 A No.
 22 Q Do you know if there is a team at Epic that
 23 handles that?
 24 A I don't know.
 25 Q Are there any members of the technical service

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1 team that spend the majority of their time
 2 analyzing the computer systems at Epic?
 3 A What do you mean, analyzing?
 4 Q I'm going to use the phrase computer system
 5 generally to include software, but it can also
 6 include hardware in this instance or database
 7 administration.
 8 A Uh-huh. Uh-huh.
 9 Q Are there any technical writing employees who
 10 spend the majority of their time in those duties
 11 as opposed to producing deliverables?
 12 MR. FINKEL: His question was more
 13 about what you mean by analyzing.
 14 Q Okay. Do you understand my question?
 15 A No.
 16 Q Okay. Let me try again. The question I'm trying
 17 to ask is whether you know of any technical
 18 writing employees who spend the majority of their
 19 time analyzing Epic's computer systems as opposed
 20 to documenting something related to the computer
 21 systems at Epic.
 22 MR. FINKEL: Object to the form.
 23 You can go ahead.
 24 A Analysis can be interpreted broadly, and so I
 25 would say a significant portion of time is spent

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1 in the analysis of computer systems by many
 2 technical writers.
 3 Q Do the technical writers you have in mind have any
 4 specialized computer training before arriving at
 5 Epic?
 6 A What do you mean, specialized computer training?
 7 Q Do they have any degrees in computer programming,
 8 computer systems analysis, computer systems
 9 engineering?
 10 A It's possible.
 11 Q Can you think of anyone specifically who has
 12 worked on your team with that background?
 13 A No.
 14 Q Okay. If we were to narrow the definition of
 15 computer systems analyst to someone with the
 16 capability, training, and background required to
 17 comprehensively analyze a computer software or
 18 hardware system, do you still believe that there
 19 are technical writers who spend the majority of
 20 their time doing that as opposed to producing
 21 deliverables?
 22 MR. FINKEL: Object to the form.
 23 A How exactly did you change the format of the
 24 question?
 25 MR. KNUTSON: I'll just have you

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1 read it back, pretty please.
 2 (Question read)
 3 A I don't know that you've narrowed the definition
 4 from the previous question. I believe that is
 5 accurate, that a substantial portion of time is
 6 spent doing systems analysis.
 7 Q Are the technical writers given input from other
 8 roles at Epic when they perform what you're
 9 describing as systems analysis?
 10 A I don't know what you mean by given input.
 11 Q Is it your testimony that the technical writers at
 12 Epic Systems are capable of independently
 13 analyzing a computer software or hardware system?
 14 A Yes.
 15 Q Okay. And your basis for that is what?
 16 A You need to understand the software at a deep
 17 level in order to write effectively. All tech
 18 comm employees go through extensive training to be
 19 certified in the software applications that they
 20 work with. Based on my understanding of the terms
 21 system analysis, that in-depth level of
 22 understanding and knowledge would qualify.
 23 Q The deep level of understanding you've described,
 24 does that include actually learning programming
 25 language?

<p style="text-align: right;">Page 69</p> <p>1 A Not necessarily.</p> <p>2 Q Does it include having the ability to actually</p> <p>3 write code?</p> <p>4 A It could.</p> <p>5 Q Can you think of anyone specifically in the</p> <p>6 technical writing team who writes code for Epic?</p> <p>7 A Yes.</p> <p>8 Q Okay. Who?</p> <p>9 A Casey Bushmaker.</p> <p>10 Q Okay. Anyone other than Casey?</p> <p>11 A Yes.</p> <p>12 Q Who?</p> <p>13 A Peter Jorsch.</p> <p>14 Q And what computer programming languages is Peter</p> <p>15 conversant with?</p> <p>16 A Caché ObjectScript.</p> <p>17 Q Any others?</p> <p>18 A Visual Basic 6.</p> <p>19 Q Do you know what language the foundation code is</p> <p>20 written in at Epic?</p> <p>21 A What do you mean by the foundation code?</p> <p>22 Q I want you to assume that Epic's healthcare</p> <p>23 software shares a common or foundation code. Do</p> <p>24 you understand the assumption I'm asking you to</p> <p>25 make?</p>	<p style="text-align: right;">Page 71</p> <p>1 Q I'm going to read to you a statement we've been</p> <p>2 provided about the technical writing process at</p> <p>3 Epic, and I just want to know if you agree or</p> <p>4 disagree with it. Okay?</p> <p>5 Our technical writers have a knack for</p> <p>6 explaining complex topics in simple language.</p> <p>7 Successful technical writers are detail oriented,</p> <p>8 can process large amounts of critical information,</p> <p>9 and thrive under tight deadlines.</p> <p>10 Anything about that description of technical</p> <p>11 writers at Epic with which you disagree?</p> <p>12 A I agree that it accurately describes some</p> <p>13 technical writers.</p> <p>14 Q How about this one: Technical writers use their</p> <p>15 skill to apply well-established techniques,</p> <p>16 procedures, and specific standards described in</p> <p>17 manuals and other sources like Cumulus and the</p> <p>18 wikis. Do you disagree with that statement?</p> <p>19 A Which type of technical writers?</p> <p>20 Q Epic Systems' technical writers.</p> <p>21 A It's a broad category.</p> <p>22 Q I understand it's broad. Is there anything in</p> <p>23 that statement that you think is untrue? I'll</p> <p>24 read to it you.</p> <p>25 A Say it one more time.</p>
<p style="text-align: right;">Page 70</p> <p>1 A Not exactly. Are you referring to the team</p> <p>2 foundation -- the foundations team at Epic and the</p> <p>3 code that they are responsible for or are you</p> <p>4 using that term more generally?</p> <p>5 Q When one of Epic's customers purchases Epic's</p> <p>6 software, that software has a foundation code</p> <p>7 within it. Do you understand what I'm saying?</p> <p>8 A Your terminology is not quite accurate.</p> <p>9 Q Okay. Why don't you tell me, then, what your</p> <p>10 understanding is of the languages used in</p> <p>11 programming the software that Epic sells to its</p> <p>12 customers.</p> <p>13 A Our database software is written in Caché</p> <p>14 ObjectScript, also known as M. It's an M variant.</p> <p>15 Our client software is a combination of Visual</p> <p>16 Basic 6, as well as C#, JavaScript, CSS, and HTML.</p> <p>17 Q Any others?</p> <p>18 A Yes, but those are the ones that come to mind.</p> <p>19 Q Okay. Thanks. Do you believe that it's a</p> <p>20 requirement for someone to be hired as a technical</p> <p>21 writer at Epic to know any of those computer</p> <p>22 languages before they are hired?</p> <p>23 A What do you mean by know?</p> <p>24 Q Be able to use them.</p> <p>25 A No.</p>	<p style="text-align: right;">Page 72</p> <p>1 Q Technical writers use their skill to apply</p> <p>2 well-established techniques, procedures, and</p> <p>3 specific standards described in manuals or other</p> <p>4 sources like Cumulus and the wikis.</p> <p>5 And then my question is is there anything in</p> <p>6 that statement that you believe is untrue?</p> <p>7 A No.</p> <p>8 Q How about this one: Part of the way Epic</p> <p>9 maintains the quality of its technical writing is</p> <p>10 by making sure the deliverables technical writers</p> <p>11 produce are reviewed and approved by a supervisor.</p> <p>12 Anything about that statement incorrect?</p> <p>13 A Yes.</p> <p>14 Q What?</p> <p>15 A At least based on my -- what I heard, it made it</p> <p>16 sound very, like, comprehensive, or like a</p> <p>17 required. Is that accurate? I didn't know if I</p> <p>18 caught the word all, but --</p> <p>19 Q Part of the way Epic maintains the quality of its</p> <p>20 technical writing is by making sure the</p> <p>21 deliverables technical writers produce are</p> <p>22 reviewed and approved by a supervisor.</p> <p>23 A That is sometimes true but oftentimes not. It</p> <p>24 doesn't paint the whole picture.</p> <p>25 Q I understand.</p>

<p style="text-align: right;">Page 73</p> <p>1 A Right.</p> <p>2 Q I assume the quality of the deliverables you</p> <p>3 produce are important to Epic?</p> <p>4 A Yes.</p> <p>5 Q And is it your understanding Epic would prefer</p> <p>6 that they be right?</p> <p>7 A Yes.</p> <p>8 Q Would you agree that an editing process helps</p> <p>9 ensure that the deliverables produced are correct?</p> <p>10 A Often.</p> <p>11 Q Technical writers at Epic interface with the</p> <p>12 developers as part of the technical writer's job;</p> <p>13 right?</p> <p>14 A Which type of technical writer?</p> <p>15 Q Is there a technical writer -- Strike that.</p> <p>16 Do any of the technical writers who work</p> <p>17 under you interact with developers in order to do</p> <p>18 their job?</p> <p>19 A Yes.</p> <p>20 Q Do the developers help the technical writers by</p> <p>21 giving them information they need to help produce</p> <p>22 their deliverables?</p> <p>23 A No. On my team?</p> <p>24 Q Sure.</p> <p>25 A No.</p>	<p style="text-align: right;">Page 75</p> <p>1 Q Is there a reason that I wouldn't understand that</p> <p>2 feature innately already?</p> <p>3 A Yes.</p> <p>4 Q Why?</p> <p>5 A Again, speaking broadly, since procedure can mean</p> <p>6 a lot of -- be interpreted many ways, there is</p> <p>7 some very complex, sophisticated procedures within</p> <p>8 the software that have, you know, many</p> <p>9 permutations of how they could be configured or</p> <p>10 how they could interact depending on individual</p> <p>11 customer systems. There is not a single,</p> <p>12 straightforward way to understand that, and you</p> <p>13 must understand the intent and all the variables</p> <p>14 that go into, again, the procedure in order to</p> <p>15 understand that at a deep enough level to digest</p> <p>16 and relay that information. And, again, this is</p> <p>17 for some technical writers.</p> <p>18 Q Thank you. I think I understand. But let me make</p> <p>19 sure.</p> <p>20 If there are multiple different options for a</p> <p>21 software update within Epic, does a developer tell</p> <p>22 the technical writer which option is going to be</p> <p>23 ultimately used?</p> <p>24 A Not necessarily.</p> <p>25 Q How does the technical writer find out what to</p>
<p style="text-align: right;">Page 74</p> <p>1 Q Are there teams within tech comm where developers</p> <p>2 give technical writers information that's useful</p> <p>3 to them in producing deliverables?</p> <p>4 A What do you mean by give them?</p> <p>5 Q Let's try it this way: I want to talk about a</p> <p>6 hypothetical deliverable I've been asked to</p> <p>7 produce that we'll call a software use procedure.</p> <p>8 Okay? As a technical writer at Epic, who am I</p> <p>9 going to talk to about what information should be</p> <p>10 contained in that software use procedure?</p> <p>11 A There are a lot of options for that that may</p> <p>12 include discussion with our development staff,</p> <p>13 implementation staff, support staff. It may also</p> <p>14 include going directly in the system to understand</p> <p>15 the procedure, since we're using generic</p> <p>16 terminology.</p> <p>17 Q Okay. What might I expect to find directly in the</p> <p>18 system that would help me?</p> <p>19 A Well, you would execute the procedure or be able</p> <p>20 to do so within the software as a means of</p> <p>21 understanding it, again, at a deeper level. You</p> <p>22 might also do the build in the system, again kind</p> <p>23 of that system analysis necessary to understand</p> <p>24 the feature in a way that ultimately our customers</p> <p>25 would need to be able to use it.</p>	<p style="text-align: right;">Page 76</p> <p>1 talk about in the deliverable for that</p> <p>2 hypothetical software update, then?</p> <p>3 A Well, again, going to my sort of previous example,</p> <p>4 it may require talking directly with customers, it</p> <p>5 may require talking to implementation staff, other</p> <p>6 technical services staff. It may involve speaking</p> <p>7 with the software developer.</p> <p>8 There is not a -- I would not characterize it</p> <p>9 as a single source of truth, as it were. It's</p> <p>10 really a synthesis of information from a variety</p> <p>11 of, you know, other individuals or, again, from</p> <p>12 using the software itself, understanding how it's</p> <p>13 built in the system.</p> <p>14 Q Okay. I'm going to give you what's probably a</p> <p>15 clumsy example, so bear with me, but let's say</p> <p>16 Epic has a customer that we'll call St. Mary's and</p> <p>17 St. Mary's OR staff wants to have the option to</p> <p>18 add a chest x-ray when they're performing a</p> <p>19 certain cardiac procedure. That request is</p> <p>20 relayed to Epic, Hey, we want this drop-down for a</p> <p>21 chest x-ray when we're doing this operative</p> <p>22 procedure. Who within Epic decides whether or not</p> <p>23 that change is feasible within the parameters of</p> <p>24 the software?</p> <p>25 A Whether it's feasible?</p>

<p style="text-align: right;">Page 77</p> <p>1 Q Whether it can be done based on the computer 2 programming available. 3 A Typically a software developer. 4 Q And continuing with this hypothetical, then, once 5 that software developer determines that, yes, we 6 can make that change, here is how we're going to 7 do it, is that then when the change is documented 8 by tech comm? 9 A Not necessarily. It first has to go through the 10 process to actually create the development, which 11 is, you know, then channeled into the design 12 process which I believe we spoke about earlier. 13 And really a lot of folks can be involved in the 14 design process, possibly including folks from 15 technical communications, software development, to 16 figure out the best way to meet that need. At the 17 point that it was released, it would then be up to 18 the technical communicator to figure out how best 19 to meet that need for the customer. 20 Q Okay. Thanks. Let's kind of transition from 21 broad view to a more narrow focus now. I want to 22 talk about some of the resources that take some of 23 the guesswork out of what the technical writers do 24 day-to-day. 25 We've talked already about the Style Guide.</p>	<p style="text-align: right;">Page 79</p> <p>1 marked as number 9. If you look at the bottom 2 right-hand corner of the first page, you'll see a 3 string of letters and numbers that end with 4006. 4 Do you see that? 5 A Yes. 6 Q If you go to the last page, it looks like it ends 7 with 4,112. 8 A Yes. 9 Q Okay. Let's, if you can, please, go to page 4100, 10 which should be a table with two columns. 11 A Let me take this out. 12 Q Have you found it? 13 A Yes. 14 Q It looks like the left column is entitled Term to 15 Avoid and then the right column is entitled 16 Replacement. Do you see that? 17 A Yes. 18 Q And we might as well use the one that I talked 19 about earlier. Do you see where it says debug or 20 debugging as a term to avoid? 21 A Yes. 22 Q It says, "Use 'troubleshoot,' or write around it. 23 For example, use 'utility' to refer to a debugging 24 tool. 'Debug' is a vague term that implies that 25 there are bugs in the system." Do you see where I</p>
<p style="text-align: right;">Page 78</p> <p>1 (Exhibit No. 27 marked for 2 identification) 3 Q You're being marked -- or handed an exhibit marked 4 27 that has four meow meows on it. I think 5 they're all the same, though. It looks like this 6 document is entitled Title Capitalization. Do you 7 see that? 8 A Yes. 9 Q Okay. Is this document intended to assist 10 technical writers in figuring out when and which 11 parts of a title should be capitalized in a 12 deliverable? 13 A I have no idea what this is supposed to do. 14 Q Okay. You haven't seen this one before? 15 A No. 16 Q Okay. Are there any conventions at Epic in tech 17 comm related to capitalization? 18 A I don't know. 19 Q Okay. Let's see. Are you familiar with the part 20 of the Style Guide that I described earlier that 21 talks about terms to avoid? 22 A No. 23 Q All right. Let's look at it quickly, then. 24 Number 9, Noah. Do we have another copy of this? 25 You've just been handed a document previously</p>	<p style="text-align: right;">Page 80</p> <p>1 read that? 2 A Yes. 3 Q Would it be fair for me to describe that as a 4 writing convention that the technical writers at 5 Epic are supposed to employ? 6 A I would say it's a recommendation. 7 Q Okay. 8 A Yes. 9 Q Why don't you turn to the page right before that 10 one, then. This one is entitled Terms to Avoid. 11 Do you see it at the top? 12 A Yes. 13 Q Right below that it says, "The following is a list 14 of terms you should avoid using in your writing." 15 Do you see that? 16 A Uh-huh. 17 COURT REPORTER: Is that a yes? 18 A Yes. 19 MR. KNUTSON: Thank you. My bad. 20 Q I don't see the word recommend or recommendation 21 in that sentence. Do you? 22 A No. 23 Q All right. Let's talk about a few more. Is there 24 a grammar wiki in tech comm? 25 A I don't know.</p>

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1 (Exhibit No. 28 marked for
 2 identification)
 3 Q You now have number 28. Have you seen this one
 4 before?
 5 A No.
 6 Q Okay. Would you agree with me it looks like this
 7 comes from Epic's wiki?
 8 A Yes.
 9 Q At the top it says Grammar, and below that it
 10 says, "This topic includes the information that is
 11 discussed in the Grammar Refresher class, as well
 12 as information about other common grammar errors."
 13 Do you see where I read that?
 14 A Yes.
 15 Q Are you aware of the grammar refresher class?
 16 A No.
 17 Q Okay. Down below there is a heading that says
 18 Agreement. It then says, "The pronoun and its
 19 antecedent must agree in number. Titles, company
 20 names, and words mentioned as words are singular.
 21 Indefinite pronouns (such as 'anyone') and
 22 interrogative pronouns (such as 'who') do not have
 23 antecedents." It then gives two wrong examples
 24 and two right examples. Do you see that?
 25 A Yes.

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1 Q Is this an example of information available to the
 2 technical writers to assist them in producing
 3 deliverables at Epic?
 4 A Yes, it is an example.
 5 Q There is a second page. Do you see that? This
 6 one is entitled Minimalism. The first sentence
 7 says, "Minimalist writing is much more than simply
 8 reducing the number of words in a document." Do
 9 you see where I read that?
 10 A Yes.
 11 Q Is minimalism a style of writing that is preferred
 12 at Epic?
 13 A I wouldn't characterize it as a style, I guess.
 14 Q Let me try to ask a better question.
 15 Is the technical writing produced at Epic
 16 intended to be succinct and minimalist as opposed
 17 to prose?
 18 A I don't think those are opposing terms. It is, by
 19 definition, prose. Right?
 20 Q Sure. Let me use a better example, then.
 21 A I agree with the statement it can be defined as
 22 removing useless information while adding useful
 23 information.
 24 Q Okay. Thanks. Let's just leave it at that, then.
 25 Are you familiar with a tech comm

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1 prioritization process?
 2 A Can you -- Do you have a more specific example?
 3 Q Sure.
 4 (Exhibit No. 29 marked for
 5 identification)
 6 MR. KNUTSON: 28?
 7 COURT REPORTER: 29. 29.
 8 MR. KNUTSON: Thanks.
 9 Q You've just been handed number 29. Take a second,
 10 look at that, and tell me if you've ever seen this
 11 before.
 12 A I have not seen this before.
 13 Q Okay. Does it appear it comes from Epic's wiki?
 14 A Yes.
 15 Q Can you find this section on the front page that
 16 says Stats Don't Think?
 17 A Yes.
 18 Q I'm going to read that out loud. It says, "The
 19 data doesn't tell you what's important or what
 20 needs improvement. It counts the things we can
 21 count so you can buttress your judgment with
 22 evidence. You should use these metrics, but you
 23 should also consider your intuition, the input of
 24 your SMEs, Epic's priorities, or any of the other
 25 factors that go into assessing the priority of a

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1 document." Did I read that correctly?
 2 A Yes.
 3 Q Do you know what is meant by data in that
 4 paragraph?
 5 A Generally or specifically?
 6 Q Are you able to discern what it's intended to
 7 convey in the context of that paragraph?
 8 A Yes.
 9 Q What is that?
 10 A I don't know the specific metrics this is
 11 referring to, but generally there is objective
 12 data that can be used to measure, but there is
 13 also a lot of judgment that needs to go into it
 14 and is contrasting the objective versus the
 15 subjective judgment of the individual writer.
 16 Q What is the objective data available?
 17 A I don't know.
 18 Q Okay. Me either. Thanks.
 19 Are you familiar with a part of the Epic tech
 20 comm wiki called The Writing Well?
 21 A No.
 22 (Exhibit No. 30 marked for
 23 identification)
 24 Q This document has been marked 30. Do you see
 25 where it says The Writing Well at the top?

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1 A Yes.
 2 Q And the first real full sentence there says, "The
 3 Writing Well is the Tech Comm team's wiki home for
 4 all things related to style, consistency, usage,
 5 and best practices for writing." Do you see that?
 6 A Yes.
 7 Q Below that it has a references section that
 8 includes what look like hyperlinks to the Epic
 9 style manual, the Microsoft Manual of Style, and
 10 the American Heritage Dictionary. Do you see
 11 that?
 12 A Yes.
 13 Q Okay. Below there are some headings and below
 14 those headings are items with bullet points. In
 15 looking at this document, what is your
 16 understanding of what the bullet-pointed items
 17 represent?
 18 A They appear to be hyperlinks to either other wiki
 19 articles or documents.
 20 Q Some examples are, and I'm in the one, two --
 21 third column now, Galaxy synonyms, grammar,
 22 minimalism, avoiding negative grammatical
 23 constructions, common clunky phrases to avoid,
 24 writing for translation. Do you see those?
 25 A Yes.

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1 Q You believe that those all likely go to hyperlinks
 2 to other areas of the wiki, some of which we've
 3 already looked at?
 4 A Yes.
 5 Q Thank you.
 6 (Exhibit No. 31 marked for
 7 identification)
 8 Q You've been handed a document that says Meeting
 9 Guidelines at the top. Do you see that?
 10 A Yes.
 11 Q Does this look like it comes from Epic's wiki?
 12 A Yes.
 13 Q Have you seen this one before?
 14 A No.
 15 Q Okay. Why don't you take a moment to read it. I
 16 just want to ask you what the general purpose of
 17 this document appears to be.
 18 Have you had a chance to review it?
 19 A Yes.
 20 Q Can you tell me what you believe the purpose of
 21 this wiki is?
 22 A General guidelines to help have effective
 23 meetings.
 24 Q Thanks.
 25 MR. FINKEL: Has that been marked?

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1 Well, maybe not.
 2 (Exhibit No. 32 marked for
 3 identification)
 4 Q You've just been given Exhibit 32 which is
 5 entitled Writing for Your Audience, which appears
 6 to have been authored by Lindsay More and Nikki
 7 Muenchow. Do you see that?
 8 A Yes.
 9 Q Okay. Have you ever seen this document before?
 10 A I don't remember.
 11 Q Do you know who Nikki Muenchow is?
 12 A Yes.
 13 Q Who is that?
 14 A She's a former coworker.
 15 Q I'm inferring that she's no longer a coworker. Is
 16 that true?
 17 A Yes.
 18 Q Okay. Why is she no longer a coworker?
 19 A She no longer works at Epic.
 20 Q Okay. When did she leave?
 21 A I don't remember exactly.
 22 Q Do you know generally?
 23 A It was around the second quarter of 2015.
 24 Q Thanks. Can you turn to the second page of this
 25 document, please? Would you agree with me that

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1 this looks like maybe a presentation of some kind,
 2 maybe these are PowerPoint slides?
 3 A Yes.
 4 Q Okay. At the bottom of page 2 it says,
 5 "Professional tone. You are not the colleague of
 6 the Doctor. Do not pretend to be. These are
 7 highly intelligent, serious people. Avoid
 8 exaggeration, advertising spin, exclamation
 9 points!, etc. Read the Style Guide for a really
 10 great description of how to write for doctors."
 11 Did I read that correctly?
 12 A Yes.
 13 Q Have you ever sat in or seen this presentation
 14 given before?
 15 A No.
 16 Q Thanks.
 17 (Exhibit No. 33 marked for
 18 identification)
 19 Q You've been handed number 33. Have you seen that
 20 document before?
 21 A No.
 22 Q Can you tell me what it's entitled?
 23 A I don't believe the document itself has a title.
 24 It looks to be a presentation that was printed
 25 out.

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1 Q Okay. What's your best guess as to what the
 2 presentation was called?
 3 A How Do I Know What to Work On?
 4 Q Okay. There is a picture of a woman on the first
 5 page. Do you see that?
 6 A Yes.
 7 Q Do you know who that is?
 8 A No.
 9 Q Take as much time as you need to look at the
 10 document, but are you able to discern what the
 11 purpose of that presentation was?
 12 A Yes.
 13 Q Okay. What do you think the purpose of that
 14 presentation was?
 15 A To help provide some guidelines and areas to look
 16 for information in our internal software that we
 17 use to manage the development process that some
 18 technical writers will use for some portions of
 19 what they work on to kind of help discover various
 20 sources of information that may be pertinent to
 21 writing the documentation.
 22 Q Thanks.
 23 (Exhibit No. 34 marked for
 24 identification)
 25 Q You've just been handed number 34 which appears to

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1 be entitled Writer Boot Camp. Is that a thing at
 2 Epic, Writer Boot Camp?
 3 A Yes.
 4 Q Is that part of training?
 5 A Yes.
 6 Q Okay. It appears to me, and you correct me if I'm
 7 wrong, that this is an exercise given to attendees
 8 of Writer Boot Camp. After you've had a chance to
 9 look at it, tell me if it looks like that to you
 10 as well.
 11 A Yes.
 12 Q Okay. At the bottom of the document there is a
 13 paragraph that says, "Write him a short email (in
 14 your own words) that explains how MyChart is
 15 useful to physicians, and at the end, tell him
 16 about a few informational documents Epic has
 17 available. To find the documents, you'll need to
 18 do a little research. Look in," and then there is
 19 a long file path, "to find customer-ready
 20 documents. Note that all of the documents in this
 21 folder are useful for physicians."
 22 It then goes on to say, "Note: If this
 23 happens to you in real life, before you send the
 24 email, talk to IS or TS on the physician's
 25 customer team." Do you see where I read that?

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1 A Yes.
 2 Q What does IS stand for in that last sentence?
 3 A Implementation services.
 4 Q And how about TS?
 5 A Technical services.
 6 Q Thanks. We're done with that one.
 7 Is editing part of the deliverable production
 8 process at Epic?
 9 A It can be.
 10 Q Are technical writers told that their documents
 11 will be edited or reviewed?
 12 A Told by whom?
 13 Q Told by anyone.
 14 A That is certainly possible.
 15 MR. KNUTSON: Okay. We must have
 16 done this one already. Sorry, Noah, just
 17 give me one second, and then I'll hand this
 18 off to you.
 19 (Exhibit No. 35 marked for
 20 identification)
 21 Q Yeah. I think we may have used that yesterday.
 22 I'm just going to be talking about a section at
 23 the bottom of the first page of that document.
 24 If you go to the bottom of that first page,
 25 there is a section that talks about editorial

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1 review that says something like be ready for lots
 2 of editorial review, it will get pretty tore up.
 3 Do you see that?
 4 A Yes.
 5 Q Okay. Do you know what "it" refers to in that
 6 sentence? It's not Rosebud probably, but would it
 7 be deliverable?
 8 A Yes. It appears to refer to written content.
 9 Q Thank you. Are technical writers given any
 10 guidance on how to find a reviewer for the
 11 deliverables they produce?
 12 A It depends.
 13 Q Do the writers who work under you know how to get
 14 one of their deliverables reviewed by someone
 15 else?
 16 A That doesn't apply.
 17 Q Okay.
 18 (Exhibit No. 36 marked for
 19 identification)
 20 Q You've just been handed number 36. Have you seen
 21 this part of Epic's wiki before?
 22 A No.
 23 Q It appears to be entitled Review, and the first
 24 section says, "After a Program document is
 25 drafted, it goes through three rounds of review

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1 (after self-review!). Do you see that sentence?
 2 A Yes.
 3 Q The word program is capitalized. Is a Program
 4 document a certain kind of document at Epic or is
 5 program being used as a term of art in that
 6 sentence?
 7 A It refers to a certain deliverable.
 8 Q Numeral 1 then says SME and peer review. What
 9 does SME stand for?
 10 A Subject matter expert.
 11 Q The first bullet point under that numeral then
 12 says, "Primary application TS for Epic community
 13 member." Do you see that?
 14 A Yes.
 15 Q Is TS there technical services?
 16 A Yes.
 17 Q Thank you. Numeral 2 says HPDR and CLAW review.
 18 Can you tell me what those two acronyms stand for,
 19 please?
 20 A High-profile document review. I don't know what
 21 CLAW stands for in this context.
 22 Q That's okay. Is there a wiki that covers
 23 abbreviations commonly used at Epic?
 24 A I don't know.
 25 Q That's it for that one.

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1 (Exhibit No. 37 marked for
 2 identification)
 3 Q You've been given 37. It's entitled S&S Review.
 4 Do you see that?
 5 A Yes.
 6 Q What does S&S stand for?
 7 A Setup and support.
 8 Q Is a Setup & Support Guide a deliverable that
 9 technical writers at Epic work on?
 10 A Yes.
 11 Q Excuse me. There is a heading that says Who
 12 Reviews the S&S Guide. Do you see that?
 13 A Yes.
 14 Q It then says, "At minimum: One developer, one
 15 QAer, one TS person, one pod representative, one
 16 writer." Did I read that list correctly?
 17 A Yes.
 18 Q What's a pod representative?
 19 A I believe that refers to what would commonly be
 20 called a work group, a member of that work group.
 21 Q Okay. Part of that section that says at minimum
 22 and then has a list, can you think of other
 23 potential reviewers of an S&S Guide that are not
 24 listed here or do you think the minimum refers to
 25 the number of each category of reviewer?

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1 A I wouldn't want to speculate about the intent. I
 2 don't -- It is not intended to be comprehensive
 3 necessarily.
 4 Q Okay. That's fine. Thanks. Is there a tech comm
 5 editing team at Epic?
 6 A Yes.
 7 Q Does the editing team focus their time on making
 8 sure that the content Epic sends out as a tech
 9 comm team to the Epic community is consistent,
 10 clear, and as helpful and useful as possible?
 11 A Yes.
 12 Q Did you ever work with Dayna Long?
 13 A No.
 14 Q Do you know her personally?
 15 A No.
 16 Q Do you know any technical communications employees
 17 at Epic who make more than \$100,000 a year?
 18 A I don't know. Salary information isn't shared.
 19 Q What's the process for a technical writer at Epic
 20 to get a raise?
 21 A There is a biannual review process. Excuse me,
 22 ranking process. The rank of the team member is,
 23 as I understand it, a significant factor in
 24 determining a raise. The rank itself is a
 25 representation of the performance of the team

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1 member.
 2 Q Their rank within the tech comm team?
 3 A Yes. It's not numeric.
 4 Q I'm sorry. I just didn't hear the last word.
 5 A It's not numeric.
 6 Q I see.
 7 A Your statement of within implied an ordinal. It's
 8 not numeric. It's a letter grade.
 9 Q Okay. I see. Is there a document you're aware of
 10 called the Common Technical Writer TLP Sheet?
 11 A Not that I'm aware of.
 12 Q I'm saying document. I'm sorry to interrupt. It
 13 may also be part of the wiki. I'm using document
 14 generically here.
 15 A Not that I'm aware of.
 16 Q Do you personally keep a list of the TLP codes you
 17 typically use in your work?
 18 A Yes.
 19 Q How do you maintain that list?
 20 A In our software. To enter it, it's a quick
 21 button, basically.
 22 Q Is that in DeLorean?
 23 A Yes.
 24 MR. KNUTSON: Okay. Real quickly,
 25 I bet I can get done in, like, 10, 12

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1 minutes. Would you prefer a break or should
 2 we just power through and get through?
 3 MR. FINKEL: Power through?
 4 THE WITNESS: We can go, yeah.
 5 MR. KNUTSON: We'll get you out of
 6 here. All right. Can I have -- Oh, this is
 7 from yesterday? All right. I'm looking for
 8 21, Noah.
 9 Q I'm going to hand you what's been previously
 10 marked as Exhibit 21. I'm going to represent to
 11 you that that's an assessment document that
 12 relates to QA employees from Epic's wiki, so I
 13 don't expect that you've seen it before. What I
 14 want to know is if you're aware of a document
 15 similar to that one that relates to assessment of
 16 technical writers.
 17 MS. SNAPP: I don't think that's
 18 the right document.
 19 MR. KNUTSON: Oh, did I give him
 20 the wrong document? Which one should he
 21 have?
 22 (Discussion held off record)
 23 Q Never mind. You have the wrong one in front of
 24 you.
 25 A Okay.

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1 Q So don't bother trying. Thanks. When do you
 2 typically start your workday?
 3 A Around 8:15 to 8:30.
 4 Q A.m.?
 5 A A.m.
 6 Q Okay. When do you typically go home?
 7 A Typically is difficult. It tends to vary.
 8 Q Okay. Do you know what your average hours per
 9 week generally are?
 10 A I don't know exactly.
 11 Q Okay. Does the DeLorean program track your weekly
 12 hours?
 13 A Yes.
 14 Q Okay. Do you have any idea what the number of
 15 hours are for any week you've worked so far in
 16 2016?
 17 A Yes.
 18 Q What were they?
 19 A They were around 45 would be --
 20 Q And if we wanted to take a look at your hours
 21 worked, all we would need to do would be to run a
 22 report from that program; right?
 23 A Yes.
 24 Q Okay. When technical writers start at Epic, are
 25 they told to expect to be working more than

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1 40 hours a week?
 2 A By whom?
 3 Q By anyone involved in their training or
 4 recruitment.
 5 A It's possible that they are told that.
 6 Q Have you ever told any technical writer to expect
 7 to work more than 40 hours a week?
 8 A I don't remember.
 9 Q Have you ever been made aware of any technical
 10 writer at Epic working more than 40 hours a week?
 11 A Yes.
 12 Q Has it happened more than once?
 13 A Has -- Have I been made aware of it more than
 14 once?
 15 Q Uh-huh. Yes.
 16 A Yes.
 17 Q Okay. I want you to choose your own adjective
 18 here. But would you say technical writers work
 19 more than 40 hours a week rarely, routinely,
 20 often, never, always?
 21 A Sometimes.
 22 Q Okay. Does it happen more often during certain
 23 periods of the month or year?
 24 A It depends which type of technical writer we're
 25 talking about.

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1 Q Have you ever reviewed a document associated with
 2 a technical writer's exit interview?
 3 A Yes.
 4 Q And on the document you're thinking of, does it
 5 include TLG averages for the hours that that
 6 technical writer had worked?
 7 A Yes.
 8 Q Do you know how that TLG average number is
 9 calculated?
 10 A No.
 11 Q Do you know who is responsible for its
 12 calculation?
 13 A No.
 14 Q If you had to find out, who would you ask?
 15 A I don't know.
 16 Q Just remind me, you've been at Epic 11 years in
 17 tech comm; is that right?
 18 A Yes.
 19 Q Has anybody ever come to you and asked whether you
 20 think that the technical writers at Epic should be
 21 paid overtime?
 22 A No.
 23 Q Has anybody ever come to you and asked if you
 24 think some of the technical writers at Epic should
 25 be paid overtime?

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1 A No.
2 Q Have you ever participated in any process at Epic
3 to try and determine whether the technical writers
4 should be paid overtime?
5 A No.
6 MR. KNUTSON: Thanks. Those are
7 all the questions I have for you today. Your
8 lawyer may have some.
9 MR. FINKEL: I have no questions,
10 and we'll reserve signature.
11 MR. KNUTSON: Then you're all done.
12 MS. HANSEN: We are off the record,
13 end of deposition, DVD 2 of 2. The time is
14 12:11.
15 (Adjourning at 12:12 p.m.)
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1 STATE OF WISCONSIN)
2 COUNTY OF DANE) ss.
3 I, PEGGY S. CHRISTENSEN, a Registered Professional
4 Reporter and Notary Public duly commissioned and
5 qualified in and for the State of Wisconsin, do
6 hereby certify that pursuant to notice, there came
7 before me on the 24th day of February 2016, at
8 9:03 in the forenoon, at the offices of Habush,
9 Habush & Rottier, S.C., Attorneys at Law, 150 East
10 Gilman Street, Suite 2000, in the City of Madison,
11 County of Dane, and State of Wisconsin, the following
12 named person, to wit: ANDREW T. DOLAN, who was by me
13 duly sworn to testify to the truth and nothing but
14 the truth of his knowledge touching and concerning
15 the matters in controversy in this cause; that
16 ANDREW T. DOLAN was thereupon carefully examined upon
17 his oath and his examination reduced to typewriting
18 with computer-aided transcription; that the
19 deposition is a true record of the testimony given by
20 the witness; and that reading and signing was not
21 waived.
22 I further certify that I am neither
23 attorney or counsel for, nor related to or employed
24 by any of the parties to the action in which this
25 deposition is taken and further that I am not a

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1 relative or employee of any attorney or counsel
2 employed by the parties hereto or financially
3 interested in the action.
4 In witness whereof I have hereunto set my
5 hand and affixed my notarial seal this 2nd day of
6 March 2016.
7
8
9 Notary Public, State of Wisconsin
10 Registered Professional Reporter
11 Certified Realtime Reporter
12 My commission expires
13 August 7, 2016
14
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